

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**RECEIVED**

*du* MAR 26 2018

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Jerome E. Watson Jr

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Cook County Jail  
Sgt. Thomas

**1:18-cv-02180**  
**Judge Virginia M. Kendall**  
**Magistrate Judge Daniel G. Martin**  
**PC8**

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

**CHECK ONE ONLY:**

**AMENDED COMPLAINT**

☒ **COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983**  
U.S. Code (state, county, or municipal defendants)

☐ **COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE**  
**28 SECTION 1331 U.S. Code** (federal defendants)

☐ **OTHER** (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

Reviewed: 8/2013

**I. Plaintiff(s):**

- A. Name: Jerome E. Watson
- B. List all aliases: N/A
- C. Prisoner identification number: 20171205115
- D. Place of present confinement: Cook County Jail
- E. Address: 2600 S. California, Chicago, IL 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Cook County Jail  
Title: C.C.J. D.O.C.  
Place of Employment: 2600 S. California
- B. Defendant: Sgt. Thomas  
Title: Sgt  
Place of Employment: 2600 S. California, Chicago, IL 60608
- C. Defendant: \_\_\_\_\_  
Title: \_\_\_\_\_  
Place of Employment: \_\_\_\_\_

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: Jerome E. Watson v. Lisa Madigan, Cook County State's Attorney; Ill State Police  
10 C0847
- B. Approximate date of filing lawsuit: Jan. 2010
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Jerome E. Watson
- D. List all defendants: LISA Madigan, Attorney General; I.D.O.C. Hiram RAY, Ill State Police; Cook County Jail; Cook County State's Attorney
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern District, Eastern Division
- F. Name of judge to whom case was assigned: Judge Cox; Virginia M. Kendall
- G. Basic claim made: Due Process Violation
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Failure state claim
- I. Approximate date of disposition: March 10, 2010

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

Dear Clerk of the Court's

At this present moment I cannot remember how many lawsuit were filed or case numbers I'm currently in C.C.J.D.O.C. and have no access to that information, If that court's can assist me in the matter, or give me more time to search for the Info. I would like help with number A, B, D, F + I.



#### IV Statement of Claim

At all times defendants are sued in their individual capacities. Defendants acted under the color of state law.

On 1-26-18 time 5 to 7 A.M. Jerome Watson was stripped searched inside the RTC/RCDC in Division 5, by 1<sup>st</sup> C/O and Sgt. Thomas. They say Watson was stripped searched and a clear bag was found, never mentioning what was in the clear bag. Watson was returned to C.P.D. 4<sup>th</sup> District and never charged, and Watson was never told what was in the clear bag by the C.P.D. officers.

Watson was degraded by Sgt. Thomas and another C/O in C.C.J.D.O.C. Sgt. Thomas told Watson to spread his buttocks over 5X.

If Watson wasn't supposed to have it, why wasn't Watson charged, when he went to the C.P.D. 4<sup>th</sup> District, or written an disciplinary action at C.C.J.D.O.C. If Watson was in possession of something illegal, or contraband, how come there were not any action taken upon him.

Also Watson was threaten over 5X's by Sgt. Thomas, that he would bring the K-9's in to bite Watson, if he did not take all his clothes off. Watson was taken behind a column inside of RTC/RCDC and humiliated by the C.C.J.D.O.C. C/O and Sgt. Thomas. Watson was also threaten with Pepper spray.

This incident was also caught on camera on 1-26-18 between 5 to 7 A.M. Again Watson was never charged with an disciplinary report in C.C.J.D.O.C., or new charges at the C.P.D. police station. Also Watson exhausted his Administrative remedy.



**V. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

\$1,000,000.00  
Compensatory Damages of ~~1,000,000.00~~ and Punitive  
Damages of \$1,000,000.00 and any relief the court  
deem just and equitable

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this March day of 9, 2018

Jerome Watson

(Signature of plaintiff or plaintiffs)

Jerome E. Watson Jr

(Print name)

20171205115

(I.D. Number)

P.O. Box 089002 ; 2600 S. California  
Chicago, IL 60608

(Address)

# Declaratory Statement

On 1-26-18, time 5 to 7 A.m., at RTC/RCDC in C.C.J.D.O.C Watson was stripped searched and was sent to the 4<sup>th</sup> District C.P.D Police station for new charges which never happened. Also Watson was not written an disciplinary report in C.C.J.D.O.C for the plastic clear bag that was recovered.

Watson was also told to spread his <sup>butt</sup> cheeks 5x which was on camera. Watson was also threaten by Sgt. Thomas with the K-9<sup>s</sup> and pepper spray



**COOK COUNTY SHERIFF'S OFFICE**

(Oficina Del Alguacil del Condado de Cook)

**INMATE GRIEVANCE RESPONSE/APEAL FORM**

(Formulario de Queja del Preso/ Apelación)

CONTROL NUMBER

INMATE #

2018  
01522

0226730

**INMATE INFORMATION TO BE COMPLETED BY INMATE SERVICES PERSONNEL ONLY**

INMATE LAST NAME (Apellido del Preso):

Watson

INMATE FIRST NAME (Primer Nombre):

Jerome

ID Number (# de Identificación):

20171205115

GRIEVANCE ISSUE AS DETERMINED BY CRW:

330-security Procedures

IMMEDIATE CRW RESPONSE (if applicable):

CRW/ REFERRED THIS GRIEVANCE TO (Example: Superintendent, Cermak Health Services):

KC DC Supt

DATE REFERRED:

2 / 6 / 2018

**RESPONSE BY PERSONNEL HANDLING REFERRAL**

INMATE WATSON WAS SEARCHED AND A PLASTIC CLEAR BAG WAS RECOVERED INMATE WAS RETURN TO CPD ALONG WITH CONTRABAND TO 4TH CPD DISTRICT FOR NEW CHARGES

PERSONNEL RESPONDING TO GRIEVANCE (Print):

CT. CINTRON T

SIGNATURE:

CT. Cintron

DIV./DEPT.

RTC/RDOC

DATE:

08 FEB 18

**THIS SECTION IS TO BE COMPLETED BY INMATE!**

INMATE

INMATE SIGNATURE (Firma del Preso):

Jerome Watson

DATE RESPONSE WAS RECEIVED: (Fecha en que la respuesta fue recibida)

2 / 15 / 18

INMATE

**INMATE'S REQUEST FOR AN APEAL (Solicitud de Apelación del Preso)****THIS SECTION IS TO BE COMPLETED BY INMATE!**

TO BE COMPLETED BY INMATE

- To exhaust administrative remedies, grievance appeals must be made within 15 calendar days of the date the inmate received the response. An appeal must be filed in all circumstances in order to exhaust administrative remedies.  
(Con el fin de agotar los recursos administrativos, las apelaciones de las quejas se deben realizar en el plazo de 15 días después de que el recluso haya recibido la respuesta. La apelación se debe enviar en todos los casos a fin de agotar los recursos administrativos.)
- Independent of the CCDOC procedure and after receiving an appeal decision, if you are dissatisfied with the outcome, you must submit the appeal grievance to the Illinois Department of Corrections, Jail and Detention Standards Unit, 1301 Concordia Court, P.O. Box 19277, Springfield Illinois 62794.  
(De manera independiente del procedimiento del CCDOC, y tras recibir la resolución de una apelación, si no está satisfecho con el desenlace, debe enviar la queja de la apelación a Illinois Department of Corrections, Jail and Detention Standards Unit, 1301 Concordia Court, P.O. Box 19277, Springfield Illinois 62794.)

DATE OF INMATE'S REQUEST FOR AN APEAL: (Fecha de la solicitud de la apelación del preso): 2 / 15 / 18

INMATE'S BASIS FOR AN APEAL: (Base del preso para una apelación:)

Was never to be stripped search by Cook County % or Sgt. Thomas.

TO BE COMPLETED BY INMATE

**ADMINISTRATOR/DESIGNEE'S ACCEPTANCE OF INMATE'S APEAL?**Yes (Si) ☐No ☒

(Apelación del preso aceptada por el administrador o/su designado(a)?)

INMATE SERVICES DIRECTOR/DESIGNEE'S DECISION OR RECOMMENDATION: (Decisión o recomendación por parte del administrador o/su designado(a):)

Original Response to Stand  
Jerome Watson

INMATE SERVICES DIRECTOR/DESIGNEE (Administrador o/su Designado(a)):

C. Mueller

SIGNATURE (Firma del Administrador o/su Designado(a)):

C. Mueller

DATE (Fecha):

2 / 20 / 18

**THIS SECTION IS TO BE COMPLETED BY INMATE!**

INMATE

INMATE SIGNATURE (Firma del Preso):

Jerome Watson

DATE APPEAL RESPONSE WAS RECEIVED: (Fecha en que la respuesta fue recibida)

2 / 24 / 18

INMATE